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September 22, 2005

**BY ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

**Re: *IP Enabled Services; E911 Requirements for IP-Enabled Service Providers; WC***  
**Docket Nos. 04-36, 05-196**

**VoIP E911 Subscriber Acknowledgement Status Report – September 22, 2005**

Dear Ms. Dortch:

Pursuant to the August 26, 2005 *Public Notice* issued by the Enforcement Bureau (DA 05-2358) related to the above-captioned proceedings, Covad Communications hereby submits its VoIP E911 Subscriber Acknowledgement Status Report.

All of Covad's VoIP customers are business customers. As of today, Covad has obtained affirmative acknowledgments from 90% of our VoIP subscribers representing more than 90% of our total station count. We expect to obtain responses from additional VoIP subscribers by September 28, 2005, but it is unlikely that we will reach a 100% acknowledgement rate. Despite the fact that not all of our customers have provided an acknowledgment, over the past two months, we contacted 100% of them—by telephone call(s), facsimile transmission, first class mail, overnight mail, and e-mail—and provided them with the Commission's required notice regarding the limitations of E911 services provided via VoIP technology.

Since its status report to the Commission on September 1, 2005, Covad has continued to implement an escalating plan to contact and obtain affirmative acknowledgments of potential VoIP E911 limitations from its subscribers. Covad intends to continue these efforts to obtain subscriber acknowledgments until it reaches 100% compliance.



As the September 28, 2005 “soft” or “warm” disconnection guidance date approaches, Covad continues to analyze the possibility of temporarily disconnecting VoIP customers not providing acknowledgments. Covad assures the Commission that it is taking all feasible actions to obtain subscriber acknowledgments.

Please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Angela Simpson

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